IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. 14-

v. : DATE FILED:_____

CHRISTOPHER STEELE : VIOLATIONS:

a/k/a "Mike Dozor" 18 U.S.C. § 2422(b) (use of an interstate

: commerce facility to entice a minor to engage in sexual conduct - 1 count)

: 18 U.S.C. § 2423(b) (interstate travel with

the intent to engage in illicit sexual conduct with a minor – 1 count)

18 U.S.C. § 2252(a)(2) (receipt of child

: pornography – 1 count)

18 U.S.C. § 2 (aiding and abetting)

: Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

In or about the summer 2013, in the Eastern District of Pennsylvania, the District of Delaware, and elsewhere, the defendant,

CHRISTOPHER STEELE, a/k/a "Mike Dozor"

used a facility and means of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice and coerce Minor #1, who had not attained the age of 18 years, to engage in sexual activity, for which any person could be charged with a criminal offense.

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

In or about the summer 2013, in the Eastern District of Pennsylvania, the District of Delaware, and elsewhere, the defendant,

CHRISTOPHER STEELE, a/k/a "Mike Dozor"

traveled in interstate commerce, that is, from the State of Delaware to the Commonwealth of Pennsylvania, for the purpose of engaging in illicit sexual conduct with a minor..

In violation of Title 18, United States Code, Section 2423(b).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

In or about the summer 2013, in the Eastern District of Pennsylvania, the District of Delaware, and elsewhere, defendant

CHRISTOPHER STEELE, a/k/a "Mike Dozor"

knowingly received a visual depiction using any means or facility of interstate or foreign commerce (that is, the Internet) and in and affecting interstate and foreign commerce, which visual depiction showed a minor engaged in sexually explicit conduct and the producing of that visual depiction involved the use of a minor engaged in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(2).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 2422, 2423(b), and 2252(a)(2), as set forth in this indictment, defendant

CHRISTOPHER STEELE, a/k/a "Mike Dozor"

shall forfeit to the United States of America:

- (a) any visual depiction described in section 2252, or any film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received as a result of such violation;
- (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such violation;
- (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such violation; and
- (d) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations of Title 18, United States Code, Sections 2422, 2423(b), and 2252(a)(2), including, but not limited to, the following:
 - (1) HP mini 110 computer, serial number CNU9337687, with Samsung hard drive, serial number S18PJD9S803824;
 - (2) Sandisk Cruzer flashdrive, serial number SDCZ6-1024:
 - (3) Samsung SGH i437 cell phone, serial number R31D60S6SMN; and
 - (4) Huawei U8655 cell phone with broken screen, serial number 5725784.

 If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER